IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

IN RE: **CHAPTER 11** §

§ § FIELDWOOD ENERGY, LLC, et al.¹, CASE NO. 20-33948 (MI)

§

§ Debtors. (Jointly Administered)

JX NIPPON OIL EXPLORATION (U.S.A.) LIMITED'S JOINDER IN OBJECTION OF XTO OFFSHORE, INC., HHE ENERGY COMPANY, AND XH LLC TO DEBTORS' SECOND MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d) OF BANKRUPTCY CODE (P-1091) AND OBJECTION OF ENI PETROLEUM US LLC AND ENI US OPERATING CO., INC. TO DEBTORS' SECOND MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE (P-1093)

JX Nippon Oil Exploration (U.S.A.) Limited ("Nippon") joins in the following objections: (1) Objection of XTO Offshore, Inc., HHE Energy Company, and XH LLC to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code (P-1091) and (2) Objection of ENI Petroleum US LLC and ENI US Operating

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Co., Inc. to Debtors' Second Motion for Entry of An Order Further Extending Exclusive Periods

Pursuant to Section 1121(d) of the Bankruptcy Code (P-1093).

For the reasons set forth in the objections set forth above, which Nippon joins in and adopts, the *Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code* (P-930) should be denied.

Dated: March 24, 2021

Respectfully submitted,

CARVER, DARDEN, KORETZKY, TESSIER, FINN, BLOSSMAN & AREAUX L. L. C.

By: /s/ Leann O. Moses
Leann Opotowsky Moses (TX # 15291750)
Peter J. Segrist (LA # 35314)
1100 Poydras Street, Suite 3100
New Orleans, Louisiana 70163
Telephone: (504) 585-3800
Telecopier: (504) 585-3801
moses@carverdarden.com
And

GIEGER, LABORDE & LAPEROUSE, L.L.C.

By: /s/ Lambert M. Laperouse
Lambert M. Laperouse (TX # 24082214)
5151 San Felipe, Suite 750
Telephone: (832) 255-6002
Facsimile: (832) 255-6001
laperouse@glllaw.com

Counsel for JX Nippon Oil Exploration (U.S.A.) Limited

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading has been served on those parties receiving electronic notification via the Court's CM/ECF System on March 24, 2021.

/s/ Leann O. Moses